



DEPARTMENT OF THE NAVY  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132-5190

5090  
Ser 06CH.DG/0424  
April 26, 2002

Ms. Triss Chesney  
State of California Environmental Protection Agency  
Department of Toxic Substances Control  
Base Closure Unit – Southern California Operations  
5796 Corporate Avenue  
Cypress, CA 90630-4700

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU)-2C  
SITES 3 AND 5, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Ms. Chesney:

This letter is submitted to request a change to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU)-2C (Sites 3 and 5) requires a revised milestone deliverable date for the Draft Final Record of Decision (ROD). Enclosure (1) presents our FFA schedule with the revised primary milestone incorporated. This request will extend the deliverable date by 9 months, and is made pursuant to Section 9.2 (g) of the FFA.

An FFA extension request for the Draft Final ROD was previously submitted on February 15, 2002 and was denied the extension pending the resolution of several issues that were discussed at the March 27, 2002 Base Closure Team (BCT) meeting. The issues to be resolved included:

- Clarification of the management approach for Anomaly Area 3, APHO 46 and MSCR 2
- Issuing a revised Draft ROD vs. a Draft Final ROD
- The need for public participation and comment on the management of APHO 46 and MSCR 2

As presented at the March 27, 2002 BCT meeting, Anomaly Area 3, APHO 46 and MSCR 2 will be addressed in the Draft Final ROD for Sites 3 and 5. Clarification regarding how these three areas will be managed was provided during the presentation. The BCT concurred with the initial approach to manage these three areas, and determined that any modifications to the management of these areas (based on findings from additional fieldwork) must receive BCT concurrence. Attached for your review is the schedule for activities at Sites 3 and 5 that the BCT concurred with at the March 27, 2002 meeting.



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Ms. Patricia Hannon  
California Regional Water Quality Control Board  
Santa Ana Region  
Remedial Project Manager  
3737 Main Street, Suite 500  
Riverside, CA 92501-3339

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU)-2C  
SITES 3 AND 5, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Ms. Hannon:

This letter is submitted to request a change to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU)-2C (Sites 3 and 5) requires a revised milestone deliverable date for the Draft Final Record of Decision (ROD). Enclosure (1) presents our FFA schedule with the revised primary milestone incorporated. This request will extend the deliverable date by 9 months, and is made pursuant to Section 9.2 (g) of the FFA.

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Ms. Nicole Moutoux  
U.S. Environmental Protection Agency  
Region IX, (SFD 8-2)  
Hazardous Waste Management Division  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU)-2C  
SITES 3 AND 5, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Ms. Moutoux:

This letter is submitted to request a change to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU)-2C (Sites 3 and 5) requires a revised milestone deliverable date for the Draft Final Record of Decision (ROD). Enclosure (1) presents our FFA schedule with the revised primary milestone incorporated. This request will extend the deliverable date by 9 months, and is made pursuant to Section 9.2 (g) of the FFA.

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- Clarification of the management approach for Anomaly Area 3, APHO 46 and MSCR 2
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As presented at the March 27, 2002 BCT meeting, Anomaly Area 3, APHO 46 and MSCR 2 will be addressed in the Draft Final ROD for Sites 3 and 5. Clarification regarding how these three areas will be managed was provided during the presentation. The BCT concurred with the initial approach to manage these three areas, and determined that any modifications to the management of these areas (based on findings from additional fieldwork) must receive BCT concurrence. Attached for your review is the schedule for activities at Sites 3 and 5 that the BCT concurred with at the March 27, 2002 meeting.

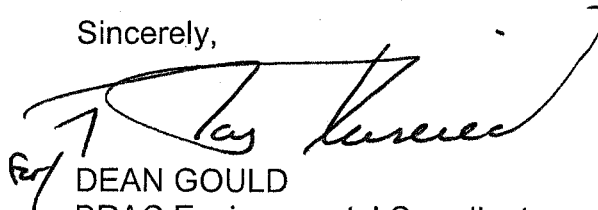
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Furthermore, the BCT concurred with the decision to issue a Draft Final ROD for Sites 3 and 5 rather than a revised Draft ROD; however, a revised Draft ROD may be warranted if data collected during fieldwork indicate that the ROD will significantly change. We will obtain BCT concurrence on whether the document will be a Draft Final ROD or revised Draft ROD before the document is submitted for review. In addition, if the Draft Final ROD will be significantly different than the Draft ROD, we will seek public participation and comment by issuing a revised Proposed Plan for OU-2C.

The Preliminary Draft Removal Site Evaluation (RSE) for Anomaly Area 3 is scheduled for completion in October 2002. In addition, fieldwork to investigate APHO 46 and MSCR 2 will also be completed by October 2002. In order to incorporate the findings for Anomaly Area 3, APHO 46 and MSCR 2 into the Draft Final ROD, we propose to issue the Draft Final ROD for Sites 3 & 5 after completion of all fieldwork, and therefore request a 9-month extension to submit the Draft Final ROD for OU-2C. The proposed date for submitting a new Draft Final ROD would therefore change from February 15, 2002 to November 14, 2002. The Draft Final ROD for Sites 3 & 5 would have a 30-day review period following submittal.

Thank you in advance for your support. Please call Ms. Kyle Olewnik at (619) 532-0789 or myself at (619) 532-0765 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Gould", with a large, sweeping flourish extending from the end of the signature.

DEAN GOULD  
BRAC Environmental Coordinator  
By direction of the Commander

- Enclosures:
1. Appendix A FFA Schedule of Submittals
  2. Schedule for IRP Sites 3 and 5

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Copy to: (w/encl)

Ms. Nicole Moutoux  
U.S. Environmental Protection Agency  
Region IX, (SFD 8-2)  
Hazardous Waste Management Division  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Ms. Patricia Hannon  
California Regional Water Quality Control Board  
Santa Ana Region  
Remedial Project Manager  
3737 Main Street, Suite 500  
Riverside, CA 92501-3339

Mr. John Scandura  
California Environmental Protection Agency  
Department of Toxic Substances Control, Region 4  
Chief Office of Military Facilities  
Southern California Operations  
5796 Corporate Avenue  
Cypress, CA 90630

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Blind copy to:

06CC.CA

06CC.LH

06CC.KO

06CC.DG

Marge Flesch, USMC BRAC

Marine Corps Outgoing file

FFA Extension file

RS.LS

Writer: K. Olewnik, 06CC.KO, 2-0789

Typist: A. Gilbert, Code 06BU.AG, 2-0934

# APPENDIX A

## MCAS El Toro Schedule

<u>Operable Unit (OU)-1: Site 18</u>	<u>Current Completion Dates</u>	<u>New Completion Dates</u>	<u>Change in Dates</u>
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	9 Nov 93	No Change	
Draft Remedial Investigation	30 Dec 94	No Change	
Draft Interim Action Feasibility Study	15 Oct 95	No Change	
Draft Final Interim Action Feasibility Study	9 Aug 96	No Change	
*Agency Approval of Draft Final	11 Oct 96	No Change	
*Response to Regulatory Draft Final Comments	15 Jan 98	No Change	
Draft Proposed Plan	18 Dec 95	No Change	
*re-Draft Proposed Plan	24 Nov 98	No Change	
3 <sup>rd</sup> Draft Proposed Plan	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	09 Jan 02	No Change	
<u>OU-2A: Site 24 (Vadose Zone)</u>			
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Feb 96	No Change	
Draft Feasibility Study	9 Aug 96	No Change	
Draft Proposed Plan	11 Mar 97	No Change	
Draft Record of Decision	1 Jul 97	No Change	
Draft Final Record of Decision	24 Sep 97	No Change	
Draft Remedial Design/Remedial Action Work Plan	6 Jan 98	No Change	
Draft Final Remedial Design	11 Aug 98	No Change	
Draft Construction Quality Assurance Plan	11 Aug 98	No Change	
Draft Construction Quality Control Plan	11 Aug 98	No Change	
Draft Contingency Plan	11 Aug 98	No Change	
Draft Project Closeout Report	22 Apr 02	No Change	
<u>OU-2A: Site 24 (Groundwater)</u>			
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Feb 96	No Change	
Draft Feasibility Study	9 Aug 96	No Change	
Draft Final Feasibility Study	5 Dec 97	No Change	
*Agency Approval of Draft Final	23 Mar 98	No Change	
Draft Proposed Plan	24 Nov 98	No Change	
2 <sup>nd</sup> Draft Proposed Plan	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	09 Jan 02	No Change	
<u>OU-2B: Sites 2 &amp; 17</u>			
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Mar 96	No Change	
Draft Final Remedial Investigation	6 Sep 96	No Change	
Draft Feasibility Study	6 Sep 96	No Change	
Draft Final Feasibility Study	18 Mar 97	No Change	
Draft Proposed Plan	18 Sep 97	No Change	

## APPENDIX A

### MCAS El Toro Schedule

	Current	New	Change in
<u>OU-2B: Sites 2 &amp; 17 (continued)</u>	<u>Completion Dates</u>	<u>Completion Dates</u>	<u>Dates</u>
Draft Final Proposed Plan	28 Jan 98	No Change	
Draft Record of Decision	4 Nov 98	No Change	
Draft Final Record of Decision	17 Jun 99	No Change	
 <u>OU-2C: Sites 3 &amp; 5</u>			
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Apr 96	No Change	
Draft Final Remedial Investigation	8 Oct 96	No Change	
Draft Feasibility Study	8 Oct 96	No Change	
Draft Final Feasibility Study	13 Feb 97	No Change	
Draft Proposed Plan	18 Sep 97	No Change	
Draft Final Proposed Plan	28 Jan 98	No Change	
Draft Record of Decision	15 Mar 99	No Change	
Draft Final Record of Decision	15 Feb 02	14 Nov 02	+9 Months
 <u>OU-3: Sites 4, 6, 9, 10, 13, 15, 19, 20, 21 &amp; 22 and OU-2A: Site 25</u>			
Draft Remedial Investigation	20 Nov 96	No Change	
Draft Feasibility Study	20 Mar 97	N/A	
Draft Proposed Plan	15 Apr 97	No Change	
Draft Record of Decision	21 Aug 97	No Change	
 <u>OU-3: Sites 8, 11, &amp; 12</u>			
Draft Remedial Investigation (included Site 16)	20 Nov 96	No Change	
Draft Feasibility Study (FS)	10 Jul 97	No Change	
Draft Final Feasibility Study	13 Jan 98	No Change	
*Agency Approval of Draft Final	22 Jun 98	No Change	
Draft Proposed Plan	28 Jul 98	No Change	
Draft Final Proposed Plan	17 Mar 99	No Change	
Draft Record of Decision	7 Jun 99	No Change	
 <u>OU-3: Sites 7 &amp; 14</u>			
Draft Remedial Investigation	7 Sep 99	No Change	
Draft Feasibility Study	N/A	No Change	
Draft Proposed Plan	9 Mar 00	No Change	
Draft Record of Decision	22 Nov 00	No Change	
 <u>OU-3: Site 16</u>			
Draft Remedial Investigation	20 Nov 96	No Change	
Draft Feasibility Study	18 Feb 00	No Change	
Draft Proposed Plan	23 May 01	No Change	
Draft Record of Decision	1 Jun 02	No Change	
 <u>OU-3: Site 1</u>			
Draft Remedial Investigation	19 Feb 03	No Change	
Draft Feasibility Study	06 Dec 03	No Change	
Draft Proposed Plan	18 Mar 04	No Change	
Draft Record of Decision	25 Aug 04	No Change	

This schedule reflects current/proposed FFA milestones.

\* Not an enforceable FFA deliverable



**ENCLOSURE 2 – SCHEDULE FOR  
IRP SITES 3 AND 5**

**REQUEST FOR A CHANGE TO THE FEDERAL  
FACILITY AGREEMENT (FFA) SCHEDULE WITH A  
9-MONTH EXTENSION FOR SUBMITTAL OF THE  
DRAFT FINAL RECORD OF DECISION FOR  
OPERABLE UNIT 2C IN ORDER TO  
INCORPORATE FINDINGS FOR ANOMALY AREA  
3, APHO 46, AND MSCR 2**

**THE ABOVE IDENTIFIED ENCLOSURE IS NOT  
AVAILABLE.**

**EXTENSIVE RESEARCH WAS PERFORMED BY  
SOUTHWEST DIVISION TO LOCATE THIS  
ENCLOSURE. THIS PAGE HAS BEEN INSERTED  
AS A PLACEHOLDER AND WILL BE REPLACED  
SHOULD THE MISSING ITEM BE LOCATED.**

**QUESTIONS MAY BE DIRECTED TO:**

**DIANE C. SILVA  
RECORDS MANAGEMENT SPECIALIST  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132**

**TELEPHONE: (619) 532-3676**